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Subject: NW Natural, FFS Comments Letter
Date: 03/21/2008 06:37 PM
Attachments: [Lcfnl-NWNatural-FFS.doc](#)
[EPA Comments on Gasco FFS 2_8_08.pdf](#)
[Comments.Gasco.FFS.Stratus.pdf](#)

Hello Bob.

DEQ has reviewed the "Groundwater/DNAPL Source Control Focused Feasibility Study – NW Natural 'Gasco' Site," received October 12, 2007 and amended November 9, 2007 (Groundwater/DNAPL FFS). Electronic copies of our comments letter and the comments provided by the EPA and Tribes shared consultant are attached.

<<Lcfnl-NWNatural-FFS.doc>> <<EPA Comments on Gasco FFS 2_8_08.pdf>>
<<Comments.Gasco.FFS.Stratus.pdf>>

Hard copies of all of the documents will be sent to you via regular mail early next week.

The Groundwater/DNAPL FFS presents NW Natural's evaluation of removal action (i.e., source control measures [SCMs]) alternatives to mitigate migration of groundwater contamination and the movement of DNAPL to the Willamette River and its sediments. The document also includes a proposal for stabilizing riverbank soils along the shoreline of NW Natural's property.

DEQ has approved NW Natural's recommendation to implement a hydraulic control/containment system along the shoreline of the NW Natural Property and the northern portion of the Siltronic Property in combination with a vertical barrier in the southern portion of the NW Natural Property to mitigate migration of contamination to the Willamette River by: 1) MGP DNAPL in the fill water-bearing zone (WBZ) and alluvial WBZ; and 2) contaminated groundwater in the alluvial WBZ.

NW Natural's riverbank stabilization proposal is not approved.

DEQ appreciates and acknowledges the work completed by NW Natural to further evaluate the vertical and horizontal extent of groundwater contamination and DNAPL, assess the relationship between uplands groundwater impacts, and groundwater and TZW contamination beneath the river, and collect sediment and surface water data in the Willamette River. The work has identified a source control strategy for mitigating contamination migrating to the river along the shoreline of the NW Natural Property and the northern portion of the Siltronic Property, including the most heavily impacted shoreline segment.

Please feel free to contact me with questions regarding this e-mail and/or attachments.

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